



UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Caption:

Carmon Dixon-Rollins

Full name(s) of Plaintiff(s)

v.

City of Philadelphia  
Captain John McCloskey  
Jackie Killen

Full name(s) of Defendant(s)

COMPLAINT  
FOR EMPLOYMENT  
DISCRIMINATION

CIVIL ACTION

NO. 14 **6945**

This action is brought for discrimination in employment pursuant to (check only those that apply):

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*NOTE: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621-634.

*NOTE: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission, and you must have been at least 40 years old at the time you believe that you were discriminated against.*

Americans with Disability Act of 1990, as codified, 42 U.S.C. §§ 12112-12117.

*NOTE: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.*

Pennsylvania Human Relations Act, as codified, 43 Pa. Cons. Stat. §§ 951-963 (race, color, family status, religious creed, ancestry, handicap or disability, age, sex, national origin, the use of a guide or support animal because of blindness, deafness or physical handicap of the user or because the user is a handler or trainer of support or guide animals).

**NOTE: In order to bring suit in federal district court under the Pennsylvania Human Relations Act, you must first file a complaint with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations, and then you must wait one year prior to filing a lawsuit.**

**I. Parties in this complaint:**

A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff

Name: Cameron Dixon-Rollins  
 Street Address: 4695 4TH Church Lane SE  
 County, City: Smyrna  
 State & Zip: GA. 30080  
 Telephone Number: (207) 997-6186

B. List all defendants' names and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the caption on the first page. Attach additional sheets of paper as necessary.

Defendant

Name: City of Philadelphia  
 Street Address: 750 Race Street  
 County, City: Philadelphia  
 State & Zip: PA 19106  
 Telephone Number: (215) 686-3280

C. The address at which I sought employment or was employed by the defendant(s) is:

Employer: City of Philadelphia (Police Department)  
 Street Address: 750 Race Street  
 County, City: Philadelphia  
 State & Zip: PA 19106  
 Telephone Number: (215) 686-3280

**II. Statement of the Claim**

A. The discriminatory conduct of which I complain in this action includes (*check only those that apply to your case*):

Failure to hire me  
 Termination of my employment  
 Failure to promote me

CAPTAIN John McCloskey (15th Dist)  
Harbison and Leverick Street  
Phila, Pa 19149  
(215) 686-3150

JACKIE KILLEN (Police Officer)  
5960 North Broad (35th District)  
Phila, Pa 19141  
(215) 686-3350

- Failure to reasonably accommodate my disability
- Failure to reasonably accommodate my religion
- Failure to stop harassment
- Unequal terms and conditions of my employment
- Retaliation
- Other (specify): *Failure to transfer me, when approved.*

**NOTE:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

B. It is my best recollection that the alleged discriminatory acts occurred or began on or about: (month) 9, (day)       , (year) 2010.

C. I believe that the defendant(s) (check one):

is still committing these acts against me.  
 is **not** still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check only those that apply and state the basis for discrimination, for example, what is your religion, if religious discrimination is alleged*):

✓ race Black color \_\_\_\_\_  
religion \_\_\_\_\_ ✓ gender/sex Female  
national origin \_\_\_\_\_  
age My date of birth is \_\_\_\_\_ (*Give your date of birth only if you are asserting a claim of age discrimination*)

E. The facts of my case are as follow (*attach additional sheets of paper as necessary*):

1. Aprox 2009/2010 I CONSTANTLY HARRASSED BY POLICE OFFICER JACKIE KILLEN. WHILE I WAS SERVICING COMPLAINTS SHE WOULD EMBARRASS ME BY MAKING SMART REMARKS IN REFERENCE TO THE ADVICE I WOULD GIVE THE COMPLAINANTS IN FRONT OF THEM. WHEN I REPORTED THESE INCIDENT TO THE OPERATION ROOM SUPERVISOR THE HARRASSMENT GOT WORSE.

A. MY WORK WAS THROWN IN THE TRASH OR HIDDEN BY P/O KILLEN & OTHERS. THIS ALSO WENT REPORT.

2. THERE WERE 4 ASSIGNMENTS TO BE FILLED IN THE OPERATIONS ROOM, WHICH AT WEEKS AT A TIME I WAS ASSIGNED 2 OR MORE OF THE 4 ASSIGNMENT ALLOWING P/O KILLEN TO COME IN HOURS LATE OR WORK PATROL. THIS TO WENT REPORTED TO THE OPERATIONS ROOM SUPERVISOR AND CAPTAIN McCLOSKEY. P/O KILLEN WAS PAID (CARRIED) FOR THE TIMES LATE.

THE NEGATIVE COMMENTS MADE BY P/O KILLEN WAS MOSTLY IN REF TO MY CHARACTER OF PRACTICING CHRISTIANITY. SHE WOULD BUMP ME IN THE HALLS, WHICH ONE OF TIMES SHE CALLED ME A "BITCH".

3. I REQUESTED TO WORK PATROL THE DAYS P/O KILLEN IS ASSIGNED THE OPERATION ROOM TO AVOID A HOSTIL & HUMILIATING ENVIRONMENT. SGT. MCNAMME WOULD HONOR MY REQUEST, BUT WHEN HE IS OFF, MY ASSIGNMENT WOULD

Changed by P/o Killen's Supervisor  
(whom which she is friends with).

An example of this, WAS a 4x12A  
Shift I WAS assigned to world Patrol  
& WAS INFORMED the day before, I  
PREPARED myself & headed to roll call,  
at 4:00pm. Operation Room STAFF  
WAS due to Report at 2:30pm which  
P/o Killen WAS ASSIGNED. P/o Killen &  
Her Supervisor began whispering  
& laughing. Her Supervisor then called  
me over to inform me my  
ASSIGNMENT HAS CHANGED to the  
Operation Room. They both began  
To laugh. I changed inside the locker  
room to PREPARE to work my REASSIGNMENT.

4. ONE DAY INSIDE THE OPERATION ROOM  
P/o Killen CALLED ME A "Black Bitch".  
(Before the Shift, I NOTIFIED SGT. SCHOVIONE  
OF THE ON-GOING HARRASSMENT by Killen.)  
This DAY she, Didn't Report For Duty until  
(APROX 7PM, BUT WAS PAID FOR 8HRS  
- I RESPONDED by tell. her I'M THROUGH  
PUTTING UP WITH HARRASSMENT.  
- I REQUEST AN INVESTIGATION & DISCIPLINE  
& I WAS IMMEDIATELY ASSIGNED TO ANOTHER  
SQUAD where the HARRASSMENT GOT  
EVEN WORSE.

5- While patrolling in my radio patrol car, I was called back to Headquarters by the Lieutenant of the Squad I was newly assigned to. I was ordered to give my patrol car to 5 squad officers (the Captain's Squad) and for me to take their patrol car.

When attempting to switch cars I noticed this patrol car was severely damaged. The door wouldn't shut all the way ~~doeet~~ due to the door frame being damaged & the glass window was completely broken out. The glass still remained on the seats & floor inside of the vehicle. I notified the same Lieutenant & I was ordered to get a broom & sweep it out & use it for the day's assignment of patrol.

As I swept the glass out the vehicle I began crying, while 4 male (white) officers from 5 squad & Killen's supervisor & my immediate supervisor stood & watched. The 4 male & Killen's supervisor began laughing uncontrollably.

6 While Responding To A Radio Call Of Gun Shots, Several Officers and a Supervisor Answered, to responded to the call.

I WAS the ONLY OFFICER that went to the Shooting ~~location~~ Location & handled the CASE alone.

I WAS NOT receiving back up on High Priority calls.

7 AFTER fearing, For my Safety I Requested a meeting with The Inspector of Northwest. AFTER Explaining, the On-Going, Incident & fear for my Safety, my TEMPORARILY TRANSFER REQUEST WAS GRANTED to the 35th DIST.

8. While working, in the 35th Dist CAPTAIN McCloskey Attempted to PUNISH me for UNINVESTIGATED paper. AFTER The 39th Dist's Lieutenant (BLACKMON) Explained to him he had NO GROUNDS, I WAS NEVER PUNISHED.

9. <sup>(suspension)</sup>  
I Received 15 days FOR INSUBORDINATION  
FOR THE (NAME CALLING) INCIDENT w/ P/L  
KILLEN "black bitch" & A REprimand  
FOR OFFICER UNBECOMING.  
P/L KILLEN Received NO consequence  
FOR HER behavior.  
I WAS discreetly transferred to the  
2nd Dist w/o notice, and without  
Captain McCloskey's knowledge.

10. While at the 2nd District  
McCloskey WAS caught in corruption  
& WAS NOT punished but WAS  
transferred to the 15th Dist (A DIST  
OF HIS CHOICE). I LIVED IN THE 15TH DIST  
AND THE 15TH DIST SHARES THE SAME  
BUILDING AS THE 2ND.  
I WAS Recently APPROVED TO GO  
TO SEVERAL UNITS. THE FO P  
President HAD A MEETING WITH  
Deputy Commissioner Ross IN REFERENCE  
TO MY SITUATION & REQUESTED MY  
TRANSFER AWAY FROM McCLOSKEY.  
IT WAS DENIED.

11. I began EXPERIENCING VANDALISM  
TO MY HOME & VEHICLE & MADE  
APPROX 9 REPORTS. I ALSO NOTIFIED  
Captain McCloskey IN MEMO FORM  
ASKING FOR HELP. MY REQUEST WENT  
UNNOTICED. THIS CONTINUED UNTIL IT  
BECAME UNBearable FOR ME, AND I MOVED TO  
GA.



**NOTE:** As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, the Pennsylvania Human Relations Commission, or the Philadelphia Commission on Human Relations.

**III. Exhaustion of Administrative Remedies:**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on: 2010 & 6-13-2011 (Date). ~~& 2011~~  
EEOC NO. 17F 201161830, EEOC NO. 201304610

B. The Equal Employment Opportunity Commission (check one):

has not issued a Notice of Right to Sue Letter.  
 issued a Notice of Right to Sue Letter, which I received on 9/28/2014 (Date).

**NOTE:** Attach to this complaint a copy of the Notice of Right to Sue Letter from the Equal Employment Opportunity Commission.

C. Only plaintiffs alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct (check one):

60 days or more have passed.  
 fewer than 60 days have passed.

D. It is my best recollection that I filed a charge with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct on: 6-2014 (Date).  
6/2011

E. Since filing my charge of discrimination with the Pennsylvania Human Relations Commission or the Philadelphia Commission on Human Relations regarding the defendant's alleged discriminatory conduct (check one):

One year or more has passed.  
 Less than one year has passed.

**IV. Relief**

**WHEREFORE**, Plaintiff prays that the Court grant such relief as may be appropriate, including injunctive orders, damages, and costs as well as (*check only those that apply*):

- Direct the defendant to hire the plaintiff.
- Direct the defendant to re-employ the plaintiff.
- Direct the defendant to promote the plaintiff.
- Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- Direct the defendant to reasonably accommodate the plaintiff's religion.
- Direct the defendant to (*specify*): \_\_\_\_\_
- If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- Other (*specify*): Pain & Suffering & Emotional Distress  
Aggravated damages.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15 day of November 2014.

Signature of Plaintiff  
Address

Carla Jo Ballou  
4695 Nth Church Lane SE  
APT 9202  
Smyrna GA 30080

Telephone number

(267) 997-6186

Fax number (*if you have one*)

\_\_\_\_\_

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
U.S. COURTHOUSE  
INDEPENDENCE MALL WEST  
601 MARKET STREET  
PHILADELPHIA, PA. 19106-1797**

November 19, 2014

Dear Petitioner:

Carmon Dixon-Rollins  
4695 North Church Lane, SE  
Apt 9202  
Smyrna, GA 30080

**Complaint(s) / Appeal(s) - Missing the following:**

- Civil Cover Sheet
- Designation Form — *Completed*
- Case Management Track Designation Form — *Completed*
- Full Filing Fee / IFP Statement
  - 1.) Complaint Fee - \$400.00
  - 2.) Appeal Fee - \$505.00
  - 3.) Habeas Fee - \$5.00
- Claim for relief

**Other:**

**Regarding:** In order for the U.S. District Court to process your Complaint the enclosed Designation form and Case Management Track form must be completed in its entirety, including checking off ONLY ONE BOX in the highlighted areas.

Very truly yours,  
MICHAEL E. KUNZ  
CLERK

Encl:



UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Caption:

Carmen Dixon-Rollins

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Jackie Killen

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(Rev. 10/2009)



**U.S. Department of Justice  
Civil Rights Division  
NOTICE OF RIGHT TO SUE  
WITHIN 90 DAYS**

CERTIFIED MAIL  
2015 1543

950 Pennsylvania Avenue, N.W.  
Karen Ferguson, EMP, PHB, Room 4239  
Washington, DC 20530

September 18, 2014

Ms. Carmon Dixon-Rollins  
4695 North Church Lane SE  
Apt. 9202  
Smyrna, GA 30080

Re: EEOC Charge Against City of Philadelphia, Police Dept.  
No. 17F201460589

Dear Ms. Dixon-Rollins:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice. If you cannot afford or are unable to retain an attorney to represent you, the Court may, at its discretion, assist you in obtaining an attorney. If you plan to ask the Court to help you find an attorney, you must make this request of the Court in the form and manner it requires. Your request to the Court should be made well before the end of the time period mentioned above. A request for representation does not relieve you of the obligation to file suit within this 90-day period.

The investigative file pertaining to your case is located in the EEOC Philadelphia District Office, Philadelphia, PA.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

Molly J. Moran  
Acting Assistant Attorney General  
Civil Rights Division

by *Karen J. Ferguson*  
Karen L. Ferguson  
Supervisory Civil Rights Analyst  
Employment Litigation Section

cc: Philadelphia District Office, EEOC  
City of Philadelphia, Police Dept.

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
U.S. COURTHOUSE  
INDEPENDENCE MALL WEST  
601 MARKET STREET  
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November 19, 2014

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Encl: